

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BENETTA SIDNEY,	)	
	)	
Plaintiff,	)	No. 09 C 7790
	)	
v.	)	Judge: Sheila Finnegan
	)	
THOMAS J. DART, SHERIFF OF COOK	)	
COUNTY and COOK COUNTY ILLINOIS,	)	
	)	
Defendants.	)	

**DEFENDANTS' AGREED MOTION FOR AN EXTENSION OF DISCOVERY**  
**TO CONDUCT THE DEPOSITION OF PLAINTIFF**

NOW COME Defendants, County of Cook, and the Sheriff of Cook County, through their attorney ANITA ALVAREZ, State's Attorney of Cook County, through her assistant, Assistant State's Attorney Patrick Smith, and, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure (FRCP), state as follows:

1. That at a status hearing on Feb. 18, 2010, the Honorable Jeffrey Cole ordered fact discovery closed on May 21, 2010.
2. That Bennetta Sidney is the Plaintiff in this action.
3. Defendants attempted to set the deposition of Plaintiff at the offices of Defendants' counsel for May 19, 2010.
4. Plaintiff is currently incarcerated at Lincoln Correctional Center in Lincoln, IL.
5. Defendants will be unable to depose Plaintiff before fact discovery closes on May 21, 2010 due to Plaintiff's incarceration at downstate penitentiary.

6. Therefore, Defendants respectfully request an extension of discovery for up to 30 days for the limited purpose of conducting the deposition of the Plaintiff.
7. This amount of time will allow counsel for Defendants to travel to Lincoln Correctional Center to conduct the Deposition of Plaintiff Bennetta Sidney.
8. On May 18, 2010, ASA Patrick Smith spoke with Thomas Morrissey, Attorney for Defendant, who agreed to this motion.

**WHEREFORE YOUR DEFENDANT PRAYS:**

1. That this Honorable Court grant an enlargement of time, at least 30 days, or until Friday, June 18, 2009 for the Defendants to conduct the deposition of the Plaintiff.
2. That this Honorable Court grant Defendants leave to conduct the deposition of Plaintiff.

Respectfully Submitted,

ANITA ALVAREZ  
State's Attorney of Cook County

By: /s/ Patrick S. Smith  
Patrick S. Smith  
Deputy Supervisor  
Conflicts Counsel Unit  
69 W. Washington, 20th floor  
Chicago, Illinois 60602  
(312) 603-1422